

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

PARALLEL IRON, LLC,

Plaintiff,

v.

ADCONION MEDIA INC., *et al.*,

Defendants.

C.A. No. 11-799-HB

JURY TRIAL DEMANDED

**PLAINTIFF PARALLEL IRON, LLC'S ANSWER
TO TELENNAV, INC.'S COUNTERCLAIMS**

Plaintiff Parallel Iron, LLC, ("Parallel Iron") files this answer to the Counterclaims asserted in Defendant TeleNav, Inc.'s ("TeleNav") Answer, Affirmative Defenses, and Counterclaims (D.I. 46):

TELENNAV'S ANSWER

1-37. Paragraphs 1 through 37 of TeleNav's Answer comprise responsive answer to which Parallel Iron need not and does not here respond.

TELENNAV'S AFFIRMATIVE DEFENSES

1-10. Paragraphs 1 through 10 of TeleNav's Affirmative Defenses comprise alleged defenses to which Parallel Iron need not and does not here respond.

TELENNAV'S COUNTERCLAIMS

1. Admitted.
2. Admitted.
3. Admitted.
4. Admitted.
5. Admitted.

TeleNav's First Counterclaim — Alleged Non-Infringement of the '565 Patent

6. Parallel Iron realleges and incorporates by reference the respective allegations, admissions, denials, and objections set forth in Paragraphs 1-5, above, and in its Complaint as if set forth in full herein.

7. Parallel Iron denies each and every allegation of Paragraph 7 of TeleNav's Counterclaims.

8. Parallel Iron denies each and every allegation of Paragraph 8 of TeleNav's Counterclaims.

9. Parallel Iron admits that TeleNav seeks a declaratory judgment regarding alleged non-infringement but denies the remaining allegations of Paragraph 9 of TeleNav's Counterclaims.

10. Parallel Iron admits that TeleNav seeks a declaratory judgment regarding alleged non-infringement but denies the remaining allegations of Paragraph 10 of TeleNav's Counterclaims.

TeleNav's Second Counterclaim — Alleged Invalidity of the '565 Patent

11. Parallel Iron realleges and incorporates by reference the respective allegations, admissions, denials, and objections set forth in Paragraphs 1-10, above, and in its Complaint as if set forth in full herein.

12. Parallel Iron denies each and every allegation of Paragraph 12 of TeleNav's Counterclaims.

13. Parallel Iron admits that TeleNav seeks a declaratory judgment regarding alleged invalidity but denies the remaining allegations of Paragraph 13 of TeleNav's Counterclaims.

TELENAV'S PRAYER FOR RELIEF

TeleNav is not entitled to any order, judgment, declaration, or other relief in its favor in this action.

PRAYER FOR RELIEF

Parallel Iron respectfully asks the Court to enter judgment granting the following relief:

- a. Denying the entirety of TeleNav's Counterclaims;
- b. Ordering that TeleNav take nothing from its Counterclaims;
- c. Granting the entirety of the relief requested in Parallel Iron's Complaint; and
- d. Any and all other relief as the Court may deem appropriate and just under the circumstances.

Dated: December 8, 2011

Of Counsel:

SNR DENTON US LLP

Mark L. Hogge
Shailendra Maheshwari
1301 K Street, N.W.
Suite 600, East Tower
Washington, DC 20005-3364
(202) 408-6400
mark.hogge@snrdenton.com
shailendra.maheshwari@snrdenton.com

Basheer Y. Ghorayeb
2000 McKinney Avenue, Suite 1900
Dallas, TX 75201-1858
(214) 259-0900
basheer.ghorayeb@snrdenton.com

BAYARD, P.A.

/s/ Stephen B. Brauerman (sb4952)

Richard D. Kirk (rk0922)
Stephen B. Brauerman (sb4952)
222 Delaware Avenue, Suite 900
P.O. Box 25130
Wilmington, DE 19899
rkirk@bayardlaw.com
sbrauerman@bayardlaw.com
(302) 655-5000

Attorneys for Plaintiff Parallel Iron, LLC